

Air Quality TIER I OPERATING PERMIT

State of Idaho Department of Environmental Quality

PERMIT No.: T1-050025

SIC: 2431

FACILITY ID No.: 027-00067

AQCR: 64 CLASS: A

UTM COORDINATE (km): 524.0, 4834.7

ZONE: 11

1	DEDA	ATTTEE

Teton Sales Company

2. PROJECT

Tier I Operating Permit Renewal

3. MAILING ADDRESS P. O. Box 177	CITY Caldwell	STATE ID	ZIP 83606
4. FACILITY CONTACT Diane Puri	TITLE General Manager	TELEPHONE (208) 459-6334	
5. RESPONSIBLE OFFICIAL Diane Puri	TITLE General Manager	TELEPHONE (208) 459-6334	
6. EXACT PLANT LOCATION 518, 604, and 612 Kit Ave., Caldwell		COUNTY Canyon	

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Door and molding surface coating and sales

8. **PERMIT AUTHORITY**

This Tier I operating permit is issued pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by DEQ on the cover page.

SHAWNEE CHEN, P.E., PERMIT WRITER		
DEPARTMENT OF ENVIRONMENTAL QUALITY		
	DATE ISSUED:	DRAFT FOR PUBLIC
		COMMENT
MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER	DATE MODIFIED/AMENDED:	
DEPARTMENT OF ENVIRONMENTAL QUALITY	DATE EXPIRES:	

MS/SYC/typist

Permit No. TI-050025

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Acronyms, Units, and Chemical Nomenclature

acfm actual cubic feet per minute
AQCR Air Quality Control Region

Btu British thermal unit CAA Clean Air Act

CFR Code of Federal Regulations

DEQ Department of Environmental Quality

dscf dry standard cubic feet

EPA U.S. Environmental Protection Agency

gal/hr gallons per hour gal/yr gallons per year gpm gallons per minute

gr grain (1 lb = 7,000 grains) HAP hazardous air pollutant

IDAPA a numbering designation for all administrative rules in Idaho promulgated in accordance with the

Idaho Administrative Procedures Act

km kilometer
lb/hr pound per hour
PM particulate matter

 PM_{10} particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers

PTC permit to construct

Rules Rules for the Control of Air Pollution in Idaho

SIC Standard Industrial Classification

TAP toxic air pollutants

TSDF treatment, storage, and disposal facility

T/yr tons per year

UTM Universal Transverse Mercator VOC volatile organic compound

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Permittee:	Teton Sales Company	Facility ID No. 027-00067	
Location:	Caldwell, Idaho	Facility ID 140. 027-00007	

1. TIER I OPERATING PERMIT SCOPE

Purpose

1.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan control strategy and the Rules.

[DRAFT]

- 1.2 This Tier I permit incorporates the following permit:
 - Permit to Construct No. P-060032, issued May 8, 2007 to fulfill requirements of the Compliance Schedule in Tier I Operating Permit No. 027-00067, issued November 6, 2002.

[DRAFT]

- 1.3 This Tier I renewal supersedes the following permit:
 - Tier I Operating Permit No. 027-00067, issued November 6, 2002.

[DRAFT]

Regulated Sources

1.4 Table 1.1 lists all sources of emissions regulated in this Tier I operating permit.

Table 1.1 REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Emissions sources at the facility, including coating processes, drying ovens, and space heaters	Throughput limits for coating materials.
3	Door coating operation at 518 Kit Avenue building	Polyester filter with 99% control efficiency for particulates. The spray booth utilizes waterbased paint to control VOC.
4	The paint and print process, and the white molding process at the 604 Kit Avenue building.	None

[PTC No. P-060032, 5/8/07]

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2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

 Table 2.1
 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
2.1	Fugitive Emissions	Reasonable Control	IDAPA 58.01.01.650-651	2.2, 2.3, 2.4, 2.11
2.5	Odors	Reasonable Control	IDAPA 58.01.01.775-776	2.6, 2.11
2.7	Visible Emissions	20% Opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 2.11
2.9	Excess Emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.9, 2.11
2.13	Particulate Matter	0.015 gr/dscf at 3% O ₂ for gas fuel	IDAPA 58.01.01.677	2.11, 2.20
2.14	Sulfur Content	ASTM Grade 1 fuel oil - 0.3% by weight. ASTM Grade 2 fuel oil - 0.5% by weight.	IDAPA 58.01.01.728	2.14.1, 2.11
2.15	Open Burning	Compliance with IDAPA 58.01.01.600-617	IDAPA 58.01.01.600-617	2.11, 2.15
2.16	Renovation or Demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.11, 2.16
2.17	Chemical Accident Prevention	Compliance with 40 CFR 68	40 CFR 68	2.17
2.18	Recycling And Emissions Reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	2.11, 2.18
2.21	Facility-wide VOC	135.5 T/yr based on 12-month rolling average	PTC No. P-060032, 5/8/07	2.11, 3.4, 4.5-4.7, 2.11
2.22-2.39	HAP emissions	Compliance with 40 CFR 63 Subpart QQQQ	40 CFR 63 Subpart QQQQ	2.22-2.39, 2.11

Fugitive Dust

2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 5/1/94]

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2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive dust emissions.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive dust emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive dust emissions, and the date the corrective action was taken.

[PTC No. P-060032, 5/8/07; IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Odors

2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Visible Emissions

2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either take appropriate

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corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[PTC No. P-060032, 5/8/07; IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Excess Emissions

Excess Emissions - General

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.
- 2.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

Excess Emissions – Startup, Shutdown, Scheduled Maintenance

2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

 A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.

[IDAPA 58.01.01.133.01.a, 3/20/97]

• Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the owner or operator demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

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• The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

Excess Emissions – Upset, Breakdown, or Safety Measures

2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

• The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

• The owner or operator shall notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

• The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

Excess Emissions – Reporting ad Recordkeeping

2.9.4 A written report for each excess emissions event shall be submitted to DEQ by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01 and 02, 3/20/97]

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2.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

An excess emissions record book for each emissions unit or piece of equipment containing copies
of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular
emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

• Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

Performance Testing

2.10 If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

The permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

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Air Quality Permit Compliance Department of Environmental Quality **Boise Regional Office** 1445 N Orchard

Boise, ID 83706

Phone: (208) 373-0550 Fax: (208) 373-0287

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Monitoring and Recordkeeping

2.11 The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

Reports and Certifications

- 2.12 Report and Certification requirements:
- 2.12.1 All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance Department of Environmental Quality **Boise Regional Office** 1445 N Orchard Boise, ID 83706

Phone: (208) 373-0550 Fax: (208) 373-0287

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10 Air Operating Permits, OAQ-107 1200 Sixth Ave. Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

Any reporting required by this permit, including, but not limited to, records, monitoring data, 2.12.2 supporting information, requests for confidential treatment, notifications of intent to test, testing reports,

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or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance Department of Environmental Quality Boise Regional Office 1445 N Orchard Boise, ID 83706

Phone: (208) 373-0550 Fax: (208) 373-0287

[PTC No. P-060032, 5/8/07]

Fuel-Burning Equipment

2.13 The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas.

[PTC No. P-060032, 5/8/07; IDAPA 58.01.01.676-677, 5/1/94]

Sulfur Content

- 2.14 The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:
 - ASTM Grade 1 fuel oil 0.3% by weight.
 - ASTM Grade 2 fuel oil 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

2.14.1 The permittee shall maintain documentation of supplier verification of distillate fuel oil content on an as-received basis.

[IDAPA 58.01.01.322.06, 5/1/94]

Open Burning

2.15 The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-617. **[IDAPA 58.01.01.600-617, 3/30/07]**

Renovation/Demolition

2.16 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

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Regulated Substances for Accidental Release Prevention

- 2.17 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:
 - Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
 - The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

Recycling and Emissions Reductions

2.18 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

Obligation to Comply

2.19 Receiving a PTC shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

[PTC No. P-060032, 5/8/07]

Fuel Type

2.20 The heated drying ovens and space heaters shall be fired by natural gas exclusively.

[PTC No. P-060032, 5/8/07]

Facility-wide VOC Emissions Limit and Its Monitoring

2.21 The facility-wide VOC emissions shall not exceed 135.5 T/yr based on 12-month rolling average. [PTC No. P-060032, 5/8/07]

40 CFR 63 Subpart QQQQ - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products

The permittee shall comply with 40 CFR 63 Subpart QQQQ. Should there be a conflict between 40 CFR 63 Subpart QQQQ and the permit conditions in this permit, requirements in 40 CFR 63 Subpart QQQQ shall govern.

[PTC No. P-060032, 5/8/07; 40 CFR 63 Subpart QQQQ]

2.23 What parts of my plant does this subpart cover?

(1) All coating operations as defined in 40 CFR 63.4781;

40 CFR 63.4781 *Coating operation* means equipment used to apply cleaning materials to a substrate to prepare it for coating application or to remove dried coating (surface preparation), to apply coating to a substrate (coating application) and to dry or cure the coating after application, or to clean coating operation equipment (equipment cleaning). A single coating operation may

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include any combination of these types of equipment, but always includes at least the point at which a coating or cleaning material is applied and all subsequent points in the affected source where organic HAP emissions from that coating or cleaning material occur. There may be multiple coating operations in an affected source. Coating application with hand-held nonrefillable aerosol containers, touchup markers, or marking pens is not a coating operation for the purposes of this subpart.

- (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed:
- (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

[PTC No. P-060032, 5/8/07; 40 CFR 63.4682]

2.24 When do I have to comply with this subpart?

Teton Sales is an existing affected facility as defined in 40 CFR 63.4682.

The date by which you must comply with this subpart is called the compliance date. The compliance date for Teton Sales, an existing affected source, is the date three years after May 28, 2003, (i.e., May 28, 2006) as specified in 40 CFR 63.4683(b).

The compliance date begins the initial compliance period. The initial compliance period begins on May 28, 2006, and ends on the last day of the 12th month following the compliance date (i.e., May 31, 2007) as specified in 40 CFR 63.4750 (see Permit Condition 2.35).

[PTC No. P-060032, 5/8/07; 40 CFR 63.4683]

2.25 What emission limits must I meet?

Per 40 CFR 63.4690(b), for an existing affected source, you must limit organic HAP emissions to the atmosphere to no more than the applicable emission limit(s) in Table 2 to this subpart, which is 1.93 lb HAP/gal solids, determined according to the requirements in 40 CFR63.4751 (see Permit Condition 2.36).

[PTC No. P-060032, 5/8/07; 40 CFR 63.4690(b)]

2.26 What are my options for meeting the emission limits?

You must include all coatings, thinners, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.4690 (see Permit Condition 2.25). Teton Sales has chosen to use 40 CFR 63.4691(b) *Emission rate without add-on controls option* as the compliance operation in their application dated June 16, 2006.

40 CFR 63.4691 (b) *Emission rate without add-on controls option*. Demonstrate that, based on the coatings, thinners, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit(s) in 40 CFR

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63.4690 (see Permit Condition 2.25), calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of 40 CFR 63.4750, 63.4751, and 63.4752 (see Permit Conditions 2.35, 2.36, and 2.37) to demonstrate compliance with the emission limit using this option.

[PTC No. P-060032, 5/8/07; 40 CFR 63.4691]

2.27 What operating limits must I meet?

(a) For any coating operation(s) on which you use the emission rate without add-on controls option, you are not required to meet any operating limits.

[PTC No. P-060032, 5/8/07; 40 CFR 63.4692]

2.28 What work practice standards must I meet?

(a) For any coating operation(s) on which you use the emission rate without add-on controls option, you are not required to meet any work practice standards.

[PTC No. P-060032, 5/8/07; 40 CFR 63.4693]

2.29 What are my general requirements for complying with this subpart?

- (a) You must be in compliance with the emission limitations in this subpart as specified in paragraphs (a)(1) of 40 CFR 63.4700.
- (1) Any coating operation(s) for which you use the emission rate without add-on controls option, as specified in §63.4691(b) (see Permit Condition 2.26(b)), must be in compliance with the applicable emission limit in §63.4690 (see Permit Condition 2.25) at all times.
- (b) You must always operate and maintain your affected source, including all air pollution control and monitoring equipment you use for purposes of complying with this subpart, according to the provisions in §63.6(e)(1)(i).

[PTC No. P-060032, 5/8/07; 40 CFR 63.4700]

2.30 What parts of the General Provisions apply to me?

Table 4 to this subpart indicates which parts of the General Provisions in §§63.1 through 63.15 apply to you.

[PTC No. P-060032, 5/8/07; 40 CFR 63.4701]

2.31 What notifications must I submit?

- (a) *General*. You must submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of 40 CFR 63.4710.
- (b) *Initial Notification*. For an existing affected source, you must submit the Initial Notification no later than 120 days after May 28, 2003.
- (c) *Notification of Compliance Status*. You must submit the Notification of Compliance Status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §63.4750 (i.e., May 31, 2007) that applies to your affected source. The Notification of Compliance

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Status must contain the information specified in paragraphs (c)(1) through (9) of 40 CFR 63.4710 and in §63.9(h).

- (1) Company name and address.
- (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- (3) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §63.4750 (i.e., May 28, 2006 through May 31, 2007) that applies to your affected source.
- (4) Identification of the compliance option or options specified in §63.4691 (see Permit Condition 2.26) that you used on each coating operation in the affected source during the initial compliance period.
- (5) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.
- (6) If you had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section.
- (i) A description and statement of the cause of the deviation.
- (ii) If you failed to meet the applicable emission limit in §63.4690 (see Permit Condition 2.25), include all the calculations you used to determine the grams organic HAP emitted per liter of coating solids used (pounds (lb) organic HAP emitted per gallon of coating solids used). You do not need to submit information provided by the materials suppliers or manufacturers, or test reports.
- (7) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data can include a copy of the information provided by the supplier or manufacturer of the example coating or material or a summary of the results of testing conducted according to §63.4741(a), or (b) (see Permit Conditions 2.36(a), or 2.36(b)). You do not need to submit copies of any test reports.
- (i) Mass fraction of organic HAP for one coating, for one thinner, and for one cleaning material.
- (ii) Volume fraction of coating solids for one coating.
- (iii) Density for one coating, one thinner, and one cleaning material, except that if you use the compliant material option, only the example coating density is required.
- (iv) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.4751 (see Permit Condition 2.36).
- (8) The calculation of grams organic HAP emitted per liter coating solids used (lb organic HAP emitted per gallon coating solids used) for the compliance option(s) you used, as specified in paragraphs (c)(8)(ii) of 40 CFR 63.4710.
- (i) This requirement doesn't apply to the permittee.

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(ii) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate, using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.4751 (see Permit Condition 2.36).

[PTC No. P-060032, 5/8/07; 40 CFR 63.4710]

2.32 What reports must I submit?

- (a) Semiannual compliance reports. You must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (7) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of 40 CFR 63.4720.
- (1) *Dates*. Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of 40 CFR 63.4720. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.4750 (i.e., begins on June 1, 2007) (see Permit Condition 2.35) that applies to your affected source and ends on June 30 or December 31, whichever occurs first following the end of the initial compliance period.
- (ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- (iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
- (iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.
- (2) Inclusion with title V report. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

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- (3) General requirements. The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (v) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to your affected source.
- (i) Company name and address.
- (ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (iv) Identification of the compliance option or options specified in §63.4691 (see Permit Condition 2.26) that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates you used each option.
- (v) If you used the emission rate without add-on controls (§63.4691(b) (see Permit Condition 2.26(b)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.
- (4) *No deviations*. If there were no deviations from the emission limitations in §§63.4690 (see Permit Condition 2.25) that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.
- (5) This requirement doesn't apply to the permittee.
- (6) Deviations: emission rate without add-on controls option. If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.4690 (see Permit Condition 2.25), the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.
- (i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.4690 (see Permit Condition 2.25).
- (ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must provide the calculations for Equations 1, 1A through 1C, 2, and 3 in §63.4751 (see Permit Condition 2.36); and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4751(e)(4) (see Permit Condition 2.36(e)(4)). You do not need to submit background data supporting these calculations (*e.g.*, information provided by materials suppliers or manufacturers, or test reports).
- (iii) A statement of the cause of each deviation.
- (7) This requirement doesn't apply to the permittee.

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2.33 What records must I keep?

You must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard.

- (a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.
- (b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner, and cleaning material and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
- (c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of this section.
- (1) A record of the coating operations at which you used each compliance option and the time periods (beginning and ending dates and times) you used each option.
- (2) This requirement doesn't apply to the permittee.
- (3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners, and cleaning materials used each month, using Equations 1, 1A through 1C, and 2 of §63.4751 (see Permit Condition 2.36); and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4751(e)(4) (see Permit Condition 2.36(e)(4)); the calculation of the total volume of coating solids used each month, using Equation 2 of §63.4751 (see Permit Condition 2.36); and the calculation of each 12-month organic HAP emission rate, using Equation 3 of §63.4751 (see Permit Condition 2.36).
- (4) This requirement doesn't apply to the permittee.
- (d) A record of the name and volume of each coating, thinner, and cleaning material used during each compliance period.
- (e) A record of the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each compliance period.
- (f) A record of the volume fraction of coating solids for each coating used during each compliance period.
- (g) A record of the density for each coating used during each compliance period; and, if you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each thinner and cleaning material used during each compliance period.
- (h) If you use an allowance in Equation 1 of §63.4751 (see Permit Condition 2.36) for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal

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facility (TSDF) according to §63.4751(e)(4) (see Permit Condition 2.36(e)(4)), you must keep records of the information specified in paragraphs (h)(1) through (3) of this section.

- (1) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.4751 (see Permit Condition 2.36); a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.
- (2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.4751 (see Permit Condition 2.36).
- (3) The methodology used in accordance with §63.4751(e)(4) (see Permit Condition 2.36(e)(4)) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.
- (i) [Reserved]
- (j) You must keep records of the date, time, and duration of each deviation.

[PTC No. P-060032, 5/8/07; 40 CFR 63.4730]

2.34 <u>In what form and for how long must I keep my records?</u>

- (a) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- (b) As specified in §63.10(b)(1), you must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (c) You must keep each record on-site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You may keep the records off-site for the remaining three years.

[PTC No. P-060032, 5/8/07; 40 CFR 63.4731]

2.35 By what date must I conduct the initial compliance demonstration?

You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.4751 (see Permit Condition 2.36). The initial compliance period begins on the applicable compliance date specified in §63.4683 (see Permit Condition 2.24) (i.e., May 28, 2006) and ends on the last day of the 12th month following the compliance date (i.e., May 31, 2007). If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate a 12-month organic HAP emission rate at the end of the initial 12-month compliance period. The initial compliance demonstration includes the calculations according to §63.4751 (see Permit Condition 2.36) and

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supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.4690 (see Permit Condition 2.25).

[PTC No. P-060032, 5/8/07; 40 CFR 63.4750]

2.36 How do I demonstrate initial compliance with the emission limitations?

You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.4690 (see Permit Condition 2.25). Any coating operation for which you use the emission rate without add-on controls option is not required to meet the operating limits or work practice standards required in §§63.4692 and 63.4693 (see Permit Conditions 2.27 and 2.28), respectively. You must meet all the requirements of this section to demonstrate initial compliance with the applicable emission limit in §63.4690 (see Permit Condition 2.25) for the coating operation(s). When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners, or cleaning materials that have been reclaimed onsite and reused in the coating operation(s) for which you use the emission rate without add-on controls option.

(a) Determine the mass fraction of organic HAP for each material. Determine the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each month according to the requirements in §63.4741(a), that is:

§63.4741 (a) Determine the mass fraction of organic HAP for each material used. You must determine the mass fraction of organic HAP for each coating, thinner, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of this section.

§63.4741 (a) (1) *Method 311 (appendix A to 40 CFR part 63)*. You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test. If these values cannot be determined using Method 311, the owner or operator shall submit an alternative technique for determining their values for approval by the Administrator.

§63.4741 (a) (1) (i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and at 1.0 percent by mass or more for other organic HAP compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (*e.g.*, 0.379178412 truncates to 0.3791).

§63.4741 (a) (1) (ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (*e.g.*, 0.763).

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§63.4741 (a) (2) *Method 24 (appendix A to 40 CFR part 60)*. For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. (Note: Method 24 is not appropriate for those coatings with a water content that would result in an effective detection limit greater than the applicable emission limit.)

§63.4741 (a) (3) *Alternative method*. You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

§63.4741 (a) (4) Information from the supplier or manufacturer of the material. You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (3) of this section, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and at 1.0 percent by mass or more for other organic HAP compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. If there is a disagreement between such information and results of a test conducted according to paragraphs (a)(1) through (3) of this section, then the test method results will take precedence unless, after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct.

§63.4741 (a) (5) Solvent blends. Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 5 or Table 6 to this subpart. If you use the tables, you must use the values in Table 5 for all solvent blends that match Table 5 entries, and you may only use Table 6 if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 and you only know whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (40 CFR part 63, appendix A) test indicate higher values than those listed on Table 5 or Table 6 (see Permit Conditions 2.38 and 2.39) to this subpart, the Method 311 results will take precedence.

(b) Determine the volume fraction of coating solids for each coating. Determine the volume fraction of coating solids for each coating used during each month according to the requirements in §63.4741(b), that is:

§63.4741 (b) Determine the volume fraction of coating solids for each coating. You must determine the volume fraction of coating solids (liters of coating solids per liter of coating) for each coating used during the compliance period by one of the methods specified in paragraph (b)(1), (2), or (3) of this section.

§63.4741 (b) (1) ASTM Method D2697–86 (Reapproved 1998) or D6093–97. You may use ASTM Method D2697–86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings' (incorporated by reference, see §63.14), or D6093–97, "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. If these values

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cannot be determined using these methods, the owner operator may submit an alternative technique for determining their values for approval by the Administrator.

§63.4741 (b) (2) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

§63.4741 (b) (3) Calculation of volume fraction of coating solids. If the volume fraction of coating solids cannot be determined using the options in paragraphs (b)(1) and (2) of this section, you must determine it using Equation 1 of this section:

$$V_s = 1 - \left(\frac{m_{\text{wolatiles}}}{D_{\text{avg}}}\right)$$
 (Eq. 1)

Where:

 V_s = Volume fraction of coating solids, liters coating solids per liter coating.

m_{volatiles} = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

 D_{avg} = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475–90 information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and other information sources, the test results will take precedence.

- (c) Determine the density of each material. Determine the density of each coating, thinner, and cleaning material used during each month from test results using ASTM Method D1475–90, information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and such other information sources, the test results will take precedence.
- (d) *Determine the volume of each material used*. Determine the volume (liters) of each coating, thinner, and cleaning material used during each month by measurement or usage records.
- (e) Calculate the mass of organic HAP emissions. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate it using Equation 1 of this section.

$$\mathbf{H_e} = \mathbf{A} + \mathbf{B} + \mathbf{C} - \mathbf{R_w} \tag{Eq. 1}$$

Where:

 H_e = Total mass of organic HAP emissions during the month, grams.

A = Total mass of organic HAP in the coatings used during the month, grams, as calculated in Equation 1A of this section.

B = Total mass of organic HAP in the thinners used during the month, grams, as calculated in Equation 1B of this section.

C = Total mass of organic HAP in the cleaning materials used during the month, grams, as calculated in Equation 1C of this section.

R_w = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, grams, determined according

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to paragraph (e)(4) of this section. (You may assign a value of zero to $R_{\rm w}$ if you do not wish to use this allowance.)

(1) Calculate the mass of organic HAP in the coatings used during the month, using Equation 1A of this section:

$$A = \sum_{i=1}^{m} (Vol_{c,i}) (D_{c,i}) (W_{c,i})$$
 (Eq. 1A)

Where:

A = Total mass of organic HAP in the coatings used during the month, grams.

Vol_{c,i} = Total volume of coating, i, used during the month, liters.

 $D_{c,i}$ = Density of coating, i, grams coating per liter coating.

W_{c,i} = Mass fraction of organic HAP in coating, i, grams organic HAP per gram coating.

m = Number of different coatings used during the month.

(2) Calculate the mass of organic HAP in the thinners used during the month, using Equation 1B of this section:

$$B = \sum_{i=1}^{n} (V \circ l_{t,i}) (D_{t,i}) (W_{t,i})$$
 (Eq. 1B)

Where:

B = Total mass of organic HAP in the thinners used during the month, grams.

 $Vol_{t,i} = Total$ volume of thinner, j, used during the month, liters.

 $D_{t,j}$ = Density of thinner, j, grams per liter.

 $W_{t,j}$ = Mass fraction of organic HAP in thinner, j, grams organic HAP per gram thinner.

n = Number of different thinners used during the month.

(3) Calculate the mass of organic HAP in the cleaning materials used during the month using Equation 1C of this section:

$$C \hspace{-0.05cm} = \hspace{-0.05cm} \sum_{k=1}^{p} \hspace{-0.05cm} \left(\hspace{-0.05cm} \hspace$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, grams.

 $Vol_{s,k}$ = Total volume of cleaning material, k, used during the month, liters.

 $D_{s,k}$ = Density of cleaning material, k, grams per liter.

 $W_{s,k}$ = Mass fraction of organic HAP in cleaning material, k, grams organic HAP per gram material.

p = Number of different cleaning materials used during the month.

- (4) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you must determine it according to paragraphs (e)(4)(i) through (iv) of this section.
- (i) You may include in the determination only waste materials that are generated by coating operations for which you use Equation 1 of this section and that will be treated or disposed of by a facility regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater.
- (ii) You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to

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a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month.

- (iii) Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this section.
- (iv) You may use any reasonable methodology to determine the amount of waste materials and the total mass of organic HAP they contain, and you must document your methodology as required in §63.4730(h) (see Permit Condition 2.33(h)). To the extent that waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.
- (f) Calculate the total volume of coating solids used. Determine the total volume of coating solids used which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of this section:

$$V_{st} = \sum_{i=1}^{m} (V \circ l_{c,i}) (V_{s,i})$$
 (Eq. 2)

Where:

 V_{st} = Total volume of coating solids used during the month, liters.

Vol_{c,i} = Total volume of coating, i, used during the month, liters.

 $V_{s,i}$ = Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to \$63.4741(b).

m = Number of coatings used during the month.

(g) Calculate the organic HAP emission rate. Calculate the organic HAP emission rate for the 12-month compliance period, grams organic HAP per liter coating solids used, using Equation 3 of this section:

$$H_{yx} = \frac{\sum_{y=1}^{12} H_e}{\sum_{y=1}^{12} V_{xx}}$$
 (Eq. 3)

Where:

 H_{yr} = Organic HAP emission rate for the 12-month compliance period, grams organic HAP per liter coating solids.

 H_e = Total mass of organic HAP emissions, grams, from all materials used during month, y, as calculated by Equation 1 of this section.

 V_{st} = Total volume of coating solids used during month, y, liters, as calculated by Equation 2 of this section.

y = Identifier for months.

(h) *Compliance demonstration*. The organic HAP emission rate for the initial 12-month compliance period, calculated using Equation 3 of this section, must be less than or equal to the applicable emission limit in §63.4690 (see Permit Condition 2.25). You must keep all records as required by §863.4730 and 63.4731 (see Permit Conditions 2.33 and 2.34). As part of the Notification of Compliance Status required by §63.4710 (see Permit Condition 2.31), you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating

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operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.4690 (see Permit Condition 2.25), determined according to this section.

[PTC No. P-060032, 5/8/07; 40 CFR 63.4751]

2.37 How do I demonstrate continuous compliance with the emission limitations?

- (a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, calculated using Equation 3 of §63.4751 (see Permit Condition 2.36), must be less than or equal to the applicable emission limit in §63.4690 (see Permit Condition 2.25). A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.4750 (see Permit Condition 2.35) is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.4751(a) through (g) (see Permit Condition 2.36(a) through (g)) on a monthly basis using data from the previous 12 months of operation.
- (b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.4690 (see Permit Condition 2.25), this is a deviation from the emission limitations for that compliance period and must be reported as specified in §§63.4710(c)(6) and 63.4720(a)(6) (see Permit Conditions 2.31(c)(6) and 2.32(a)(6)).
- (c) As part of each semiannual compliance report required by §63.4720 (see Permit Condition 2.32), you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.4690 (see Permit Condition 2.25), determined according to §63.4751(a) through (g) (see Permit Conditions 2.36(a) through (g)).
- (d) You must maintain records as specified in §§63.4730 and 63.4731 (see Permit Conditions 2.33 and 2.34).

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2.38 <u>Table 5 to Subpart QQQQ of Part 63—Default Organic HAP Mass Fraction for Solvents and Solvent Blends</u>

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data.

Solvent/solvent blend	CAS. No.	Average organic HAP mass fraction	Typical organic HAP, percent by mass
1. Toluene	108-88-3	1.0	Toluene.
2. Xylene(s)	1330-20-7	1.0	Xylenes, ethylbenzene.
3. Hexane	110-54-3	0.5	n-hexane.
4. n-Hexane	110-54-3	1.0	n-hexane.
5. Ethylbenzene	100-41-4	1.0	Ethylbenzene.
6. Aliphatic 140		0	None.
7. Aromatic 100		0.02	1% xylene, 1% cumene.
8. Aromatic 150		0.09	Naphthalene.
9. Aromatic naphtha	64742-95-6	0.02	1% xylene, 1% cumene.
10. Aromatic solvent	64742-94-5	0.1	Naphthalene.
11. Exempt mineral spirits	8032-32-4	0	None.
12. Ligroines (VM & P)	8032-32-4	0	None.
13. Lactol spirits	64742-89-6	0.15	Toluene.
14. Low aromatic white spirit	. 64742-82-1	0	None.
15. Mineral spirits	64742-88-7	0.01	Xylenes.
16. Hydrotreated naphtha	64742-48-9	0	None.
17. Hydrotreated light distillate	64742-47-8	0.001	Toluene.
18. Stoddard solvent	8052-41-3	0.01	Xylenes.
19. Super high-flash naphtha	. 64742-95-6	0.05	Xylenes.
20. Varsol ® solvent	8052-49-3	0.01	0.5% xylenes, 0.5% ethylbenzene.
21. VM & P naphtha	64742-89-8	0.06	3% toluene, 3% xylene.
22. Petroleum distillate mixture	68477-31-6	0.08	4% naphthalene, 4% biphenyl.

[PTC No. P-060032, 5/8/07; 40 CFR 63 Subpart QQQQ Table 5]

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2.39 <u>Table 6 to Subpart QQQQ of Part 63—Default Organic HAP Mass Fraction for Petroleum Solvent Groups\a\</u>

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data.

Solvent type	Average organic HAP mass fraction	Typical organic HAP, percent by mass
Aliphatic \b\ Aromatic \c\	0.03 0.06	1% xylene, 1% toluene, and 1% ethylbenzene. 4% xylene, 1% toluene, and 1% ethylbenzene.

[\]a\ Use this table only if the solvent blend does not match any of the solvent blends in Table 5 to this subpart and you only know whether the blend is aliphatic or aromatic.

[PTC No. P-060032, 5/8/07; 40 CFR 63 Subpart QQQQ Table 6]

[\]b\ E.g., Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

[\]c\ E.g., Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

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3. DOOR COATING OPERATION AT 518 KIT AVENUE

Summary Description

The following is a narrative description of the door-coating operations regulated in this Tier I operating permit. This description is for informational purposes only.

[DRAFT]

3.1 **Process Description**

The building at 518 Kit Ave. (Building No. 1) houses the door coating operations. Doors are hand-attached to hangers that are mechanically conveyed along a suspended rail through the spray booth where workers spray coat the doors with hand-held, air-assisted airless spray guns. The airless spray guns have a total maximum throughput capacity of 75 gallons per hour. Water-based paint is used.

After coating, the doors are routed through a heated drying oven, which is a paneled, ventilated enclosure with natural gas-fired heaters (560,000 Btu per hour total heat input). The oven ventilation system consists of an exhaust blower operating at 5,000 cubic feet per minute (cfm). After passing through the oven, each door is removed from its hanger. The door-coating line was constructed in November of 1995.

[PTC No. P-060032, 5/8/07]

3.2 Emission Control Description

The spray booth is a wide, ventilated enclosure that draws air past the spraying activity through a polyester particulate filter with 99% control efficiency. The paint booth air is exhausted through a roof vent at a rate of 25,000 cfm. In addition, the spray booth uses water-based paint to tremendously reduce the VOC, HAP, and TAP emitted to the ambient air.

There is no emissions control on the heated drying oven and space heaters.

[PTC No. P-060032, 5/8/07]

Table 3.1 describes the devices used to control emissions from the door-coating operation.

Table 3.1 DOOR COATING OPERATION DESCRIPTION

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Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point		
Spray booth	Polyester filter, with 99% control efficiency, to control PM; Using water-based paint to reduce VOC, HAPs/TAPs emissions	Spray booth stack/roof vent		
Heated drying oven	none	Building exhaust blower		
Space heaters	none	Space heater stacks		

Table 3.2 contains only a summary of the requirements that apply to the door coating operation. Specific permit requirements are listed below Table 3.2.

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Table 3.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
	PM_{10}	0.58 lb/hr and 1.28 T/yr		3.4 - 3.8, 2.11, and in
3.3	Calcium Carbonate	713.3 lb/day (State-only)	DTC N- D	addition 3.9-3.12 for
	Quartz	5.52 lb/day (State-only)	PTC No. P- 060032, 5/8/07	PM ₁₀ only
3.3.5/2.21	Facility-wide VOC	135.5 T/yr	000032, 3/8/07	2.11, and 3.4

Permit Limits / Standard Summary

3.3 **Emission Limits**

3.3.1 The PM_{10} emissions from the spray booth stack shall not exceed 0.58 lb/hr based on a calendar day average.

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3.3.2 The PM_{10} emissions from the spray booth stack shall not exceed 1.28 T/yr based on a calendar year average.

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3.3.3 The Calcium Carbonate emissions from the door operation shall not exceed 713.3 lb/day based on a calendar day average.

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3.3.4 The Quartz emissions from the door operation shall not exceed 5.52 lb/day based on a calendar day average.

[PTC No. P-060032, 5/8/07, (State-only)]

3.3.5 The permittee shall comply with the facility-wide VOC emissions limit specified in Permit Condition 2.21.

[PTC No. P-060032, 5/8/07]

Operating Requirements

3.4 **Throughput Limits**

3.4.1 Daily Throughput Limits

- The throughput of water reducible lacquer shall not exceed 9 gal/hr based on a calendar day average period.
- The throughput of millwork primer shall not exceed 9 gal/hr based on calendar day average period.

3.4.2 Annual Throughput Limits

- The throughput of water reducible lacquer shall not exceed 39,600 gal/yr based on rolling 12-month average period.
- The throughput of millwork primer shall not exceed 39,600 gal/yr based on rolling 12-month average period.

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3.5 **Operations and Maintenance (O&M) Manual Requirements**

- 3.5.1 The permittee shall have developed an O&M manual for the door-coating spray booth particulate matter filtration system that describes the procedures that will be followed to comply with Permit Conditions 3.3.1 and 3.3.2. The O&M manual shall include, but not be limited to, the following:
 - A general description of the spray booth and its ventilation system,
 - Normal operating conditions and procedures,
 - The appropriate pressure drop operating range as determined by Permit Condition 3.5.2,
 - Particulate matter filter manufacturer documentation verifying a minimum capture efficiency of 99%.
 - Maintenance procedures, and
 - Corrective action procedures.

Particulate matter filter vendor documentation shall be kept with and shall be a part of the O&M manual.

3.5.2 Spray Booth Filtration System Pressure Drop Operating Range

The permittee shall have determined the appropriate pressure drop operating range for the spray booth filtration system based on the systems physical characteristics, the air flow rate through the system, and the particulate matter filter manufacturer specifications and recommendations. These data shall be incorporated into the O&M manual required by Permit Condition 3.5.1. The pressure drop across the filtration system shall be maintained within this range when in operation.

- 3.5.3 The permittee shall operate spray booth filtration system in accordance with the O&M manual.
- 3.5.4 The O&M manual shall remain on site at all times and shall be made available to DEQ representatives upon request.
- 3.5.5 The permittee shall have submitted a copy of the O&M manual to DEQ at the following address:

Air Quality Permit Compliance Department of Environmental Quality Boise Regional Office 1445 N. Orchard Boise, ID 83706

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Monitoring and Recordkeeping Requirements

3.6 Throughput Monitoring Requirement

3.6.1 Monitoring Daily Throughputs

For water reducible lacquer and millwork primer, respectively:

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- When the door coating line is in operation, the permittee shall record, in gallons per day, the amount of coating applied in the door coating line.
- When the door coating line is in operation, the permittee shall record, in hours per day, the daily hours of operation of the door coating line.

The permittee shall then calculate and record the average gallons per hour of coatings applied over a calendar day average period by dividing the hours of operation into the gallons applied.

3.6.2 <u>Monitoring Requirement for Annual Throughputs</u>

For water reducible lacquer and millwork primer, respectively:

Monthly, the permittee shall record the amount of coatings, in gallons per month, purchased in the previous month; and the permittee shall then calculate and record, on a 12-month rolling basis, the amount of coatings purchased in the previous 12-month period. The permittee shall keep on site all coating purchase records.

[PTC No. P-060032, 5/8/07]

3.7 <u>Monitoring Filtration System Pressure Drop</u>

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, pressure drop monitoring equipment to continuously measure the pressure differential across the door-coating spray booth filtration system. The pressure differential shall be recorded once per day while the spray paint booth is operating.

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3.8 **Recordkeeping Requirements**

Records required in Permit Conditions 3.6 and 3.7 shall remain on site for the most recent five years, and shall be made available to DEO representatives upon request.

[PTC No. P-060032, 5/8/07]

40 CFR 64 - Compliance Assurance Monitoring for PM₁₀ Emissions Limits

3.9 **General Requirement**

The permittee shall comply with Permit Conditions 3.10 through 3.13 developed based on, or taken from, 40 CFR 64 for PM_{10} emissions limits for the door-coating spray booth particulate matter filtration system.

Should there be an inconsistency between 40 CFR 64 and Permit Conditions 3.10 through 3.13, requirements in 40 CFR 64 shall govern.

[DRAFT, 40 CFR 64]

3.10 Approved Monitoring Requirements in Accordance with 40 CFR 64.6

The permittee shall comply with the following approved monitoring requirements for the door-coating spray booth particulate matter filtration system.

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Table 3.3 MONITORING REQUIREMENT FOR THE DOOR-COATING SPRAY BOOTH PARTICULATE MATTER FILTRATION SYSTEM

	MATTER FILTRATION STSTEM
	Indicator No.1
I. Indicator	Pressure drop across the filtration system
	Pressure drop across the filtration system is measured using a
Measurement Approach	Dwyer Mark II Molded Plastic Manometer.
II. Indicator Range	- Greater than zero and less than 0.51 inches of water
	- An excursion is defined as a pressure drop outside of the aforementioned range
III. Performance Criteria	
A. Data Representativeness	- The manometer was installed and shall be operated in accordance with the instructions provided by Dwyer Instruments, Inc. for the Dwyer Mark II Molded Plastic Manometer.
	-Permit Conditions 3.5 and 3.7.
	-The manometer continuously measures the air pressure and has +/- 3% accuracy up to 10 psi and up to 140°F.
B. Verification of Operational Status	- Permit Condition 3.7
	- The filtration system shall be visually inspected prior to spray booth operation and the turning on of the exhaust fan. Once the exhaust fan is turned on, the manometer pressure readings shall be observed and recorded.
C. QA/QC Practices and Criteria	The manometer shall be zeroed each day prior to operation of the paint booth and calibrated annually per manufacturer's recommendations.
D. Monitoring Frequency	The manometer shall be observed every 30 minutes during the operation. If the pressure drop is outside of the range of the clean to loaded filter pressure drop range, or within 0.02 inch water of the maximum value of the pressure drop range, then the operation shall be shut down and the filter shall be replaced.
Data Collection Procedures	Once the exhaust fan is turned on, the manometer pressure readings shall be observed and recorded in a log as specified under Verification Of Operational Status.
	The pressure differential shall be recorded at least once per day while the Spray Booth is operating.
Averaging period	a calendar day average

[DRAFT, 40 CFR 64.6]

3.11 40 CFR 64.7 - Operation of Approved Monitoring

- (a) *Commencement of operation*. The owner or operator shall conduct the monitoring required under this part (i.e., 40 CFR 64) upon issuance of a part 70 or 71 permit that includes such monitoring. (i.e., This Tier I OP renewal)
- (b) *Proper maintenance*. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (c) *Continued operation*. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality

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assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

- (d) Response to excursions or exceedances. (1) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (2) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (e) *Documentation of need for improved monitoring*. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit (i.e., Tier I OP) to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[DRAFT, 40 CFR 64.7]

3.12 40 CFR 64.8 - Quality Improvement Plan (OIP) Requirements

The permittee shall comply with QIP requirements if they are required in accordance with 40 CFR 64.8.

[DRAFT, 40 CFR 64.8]

3.13 **40 CFR 64.9 -Reporting and Recordkeeping Requirements**

- (a) General reporting requirements. (1) On and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part (i.e., 40 CFR 64) the owner or operator shall submit monitoring reports to the permitting authority in accordance with 40 CFR 70.6(a)(3)(iii).
- (2) A report for monitoring under this part (i.e., 40 CFR 64) shall include, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the following information, as applicable:
- (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

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- (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (iii) Does not apply to the permittee because Quality Improvement Plan is not required.
- (b) General recordkeeping requirements. (1) The owner or operator shall comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
- (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[DRAFT, 40 CFR 64.9]

3.14 **40 CFR 64.10 - Savings provisions**

- (a) Nothing in this part (40 CFR 64) shall:
- (1) Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.
- (2) Restrict or abrogate the authority of the Administrator or the permitting authority to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.
- (3) Restrict or abrogate the authority of the Administrator or permitting authority to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.

[DRAFT, 40 CFR 64.10]

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4. MOLDING COATING PROCESSES AT 604 KIT AVENUE

Summary Description

4.1 **Process Description**

4.1.1 The Paint and Print Process

When the Paint and Print Process is operating, molding is conveyed through roll coater No.1 which rolls a high solids sealer onto the molding. The molding is then sent to the oven for drying. There are no PM emissions from roll coater No.1 and other emissions are drawn out of the building by a nearby 5,000 actual cubic feet per minute (acfm) wall vent. From the oven, the molding passes through one of two buffers which are considered insignificant activities (IDAPA 58.01.01.317.01.a.i.(49)). The molding then passes through fan coater No.1 which discharges a fan-shaped curtain of brown basecoat over the molding. There are no PM emissions from any of the fan coaters and VOC, HAP and TAP emissions are captured by a ventilation hood and vented through the wall or the roof. The molding then enters the oven for drying before it is routed through one of two printers which can be shuffled on and off line depending on the type of molding being patterned, if any. The printers imprint a wood grain pattern such as oak or pine onto the molding. There are no PM emissions from either of the two printers and VOC, HAP and TAP emissions are captured by a ventilation hood and vented through the wall vent. The molding then passes through fan coater No.3 which applies a satin lacquer topcoat to the molding.

After proper coating and printing, the molding is routed through a heated drying oven, which is a paneled, ventilated enclosure with four natural gas-fired heaters (560,000 Btu per hour total heat input). Two 100,000 Btu per hour natural gas-fired heaters are used as space heaters for heating the building at 604 Kit Avenue. The oven ventilation system consists of an exhaust blower operating at 5,000 acfm.

Molding coating equipment for the Paint and Print Process consists of:

- -Roll Coater No.1
- -Fan Coater No.1
- -Fan Coater No.3
- -Printer No.1 and Printer No.2
- -Two Buffers

4.1.2 The White Molding process

When the White Molding Process is operating, molding is conveyed through roll coater No.1 and then enters the oven for drying. From the oven, the molding passes through one of two buffers and is then conveyed through fan coater No.4 which applies a layer of white basecoat onto the molding. The molding passes through the oven for additional drying before being coated by another layer of white basecoat from fan coater No.2. After proper coating, the molding is routed again through the drying oven.

Molding coating equipment for the White Molding Process consists of:

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- -Roll Coater No.1
- -Fan Coater No.2
- -Fan Coater No.4
- 4.1.3 Only one of the two molding coating processes can run at a time due to the equipment configuration in 604 Kit Avenue building. Fan coaters No.1 and No.4 are in parallel along with fan coaters No.2 and No.3, and therefore are unable to operate simultaneously.
- 4.1.4 Three coating process wall vent stacks were modeled at a height of 23 feet to take into account the proposed wall vent stacks height increases. The flowrate of each coating process wall vent stack was modeled at 5,000 acfm.
- 4.1.5 There is a paint mix area in the building at 604 Kit Avenue.

[PTC No. P-060032, 5/8/07]

4.2 Emission Control Description

There is no emissions control on the molding coating operation, heated drying oven, and space heaters.

[PTC No. P-060032, 5/8/07]

Table 4.1 describes the devices used to control emissions from molding coating processes

Table 4.1 MOLDING COATING PROCESSES DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Molding coating processes	None	Three wall vent stacks
Heated drying oven	None	The building exhaust blower
Space heater	None	Space heater stacks

[PTC No. P-060032, 5/8/07]

Table 4.2 contains only a summary of the requirements that apply to the molding coating processes. Specific permit requirements are listed below Table 4.2.

 Table 4.2
 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
4.3	Toluene	765.6 lb/day (State-only)	PTC No. P-	4.5-4.7
4.3.2/2.21	Facility-wide VOC	135.5 T/yr	060032, 5/8/07	4.5-4.7, and 2.11

Permit Limits / Standard Summary

4.3 <u>Emission Limits</u>

4.3.1 The Toluene emissions from the coating processes at 604 Kit Avenue building shall not exceed 765.6 lb/day based on a calendar day average.

[PTC No. P-060032, 5/8/07 (State-only)]

4.3.2 The permittee shall comply with the facility-wide VOC emissions specified in Permit Condition 2.21.

[PTC No. P-060032, 5/8/07]

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Operating Requirements

4.4 Stack Height for Three Coating Processes Venting Stacks

Within 60 days of permit issuance, the permittee shall have extended the stack height to 23 feet for each of the three coating processes venting stacks.

[PTC No. P-060032, 5/8/07]

4.5 Coating Materials Throughput Limits

The throughput of each coating material used in the building at 604 Kit Avenue shall not exceed any corresponding limit listed in Table 4.3.

Table 4.3 THROUGHPUT LIMIT FOR COATING MATERIALS

Coating material (coating/thinner)	Daily limit	Annual limit
	(gal/day)	(gal/yr)
Fan coater No.1- brown basecoat	48	8,800
Fan coater No.4- white basecoat	105.6	19,360
Fan coater No.2- white basecoat	76.8	14,080
Fan coater No.3- topcoat	24	4,400
Roll coater No.1- burnishing sealer	16.8	3,080
Printers- colored ink paste	19.2	3,520
T-6 Thinner	136.8	25,080
Glycol ether	na ^a	65

^a Not applicable. Daily limit is for meeting Toluene emissions limit only.

[PTC No. P-060032, 5/8/07]

Monitoring and Recordkeeping Requirements

4.6 <u>Coating Materials (Coating/Thinner) Throughput Monitoring</u>

4.6.1 <u>Monitoring Daily Throughput</u>

The permittee shall record the daily throughput of each coating material that has throughput limit(s) listed in Table 4.3.

4.6.2 Monitoring Annual Throughput

Monthly, the permittee shall record the amount of coatings, in gallons per month, purchased in the previous month; and the permittee shall then calculate and record, on a 12-month rolling basis, the amount of coatings purchased in the previous 12-month period. The permittee shall keep on site all coating purchase records.

[PTC No. P-060032, 5/8/07]

4.7 Recordkeeping Requirements

Records required in Permit Condition 4.6 shall remain on site for the most recent five years period, and shall be made available to DEQ representatives upon request.

[PTC No. P-060032, 5/8/07]

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5. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in the Tier I operating permit to qualify for a permit shield.

Table 5.1 INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation
2,500 gallon T-6 storage tank	58.01.01.317.b.i.3
3,000 gallon acetone storage tank.	58.01.01.317.b.i.3
280,000 Btu/hr natural gas oven heaters Building No. 1	58.01.01.317.b.i.5
380,000 Btu/hr natural gas oven heaters Building No. 2	58.01.01.317.b.i.5
Buildings No. 1 and No. 2 - Portable Totes and Drums	58.01.01.317.a.i.37

5.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

[IDAPA 58.01.01.317, 3/23/98]

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6. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

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8. Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/6/05; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01. 383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/5/00; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

12. Unless specifically identified as a "State-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]

13. Provisions specifically identified as a "State-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

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Inspection and Entry

- 14. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/6/05; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

Certification

17. All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

18. a. The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

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b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

- 19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
 - a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - i. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
 - b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
 - c. Nothing in this permit shall alter or affect the following:
 - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
 - b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
 - c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.

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d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

- 21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:
 - a. The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
 - b. The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
 - c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
 - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
 - iii. The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii. above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
 - iv. Such information as the Department may require to determine the compliance status of the emissions unit.
 - d. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

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False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit. [IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

27. In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]